

REMARKS

In the Final Office Action, the Examiner objected to claims 1, 10, and 18; rejected claims 1, 3, 4, 6-10, 12, 14-18, and 23-26 under 35 U.S.C. § 103(a) as being unpatentable over U.S. 2002/0184401 to Kadel et al. ("*Kadel*"), in view of U.S. 2005/0005261 to Severin ("*Severin*"), further in view of U.S. 7,086,065 to Yeluripati et al. ("*Yeluripati*"); and rejected claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel*, *Severin*, and *Yeluripati* further in view of U.S. 6,920,461 to Hejlsberg ("*Hejlsberg*").

Applicants thank the Examiner for granting the February 4, 2010 telephonic interview with Applicants' representative. During the interview the Examiner suggested amendments to the claim language to expedite prosecution towards allowance. The proposed amendments submitted herewith reflect those suggestions.

Applicants propose to amend claims 1, 3, 4, 6-10, 12, 14-18, and 20-26. Upon entry of this amendment, claims 1, 3, 4, 6-10, 12, 14-18, and 20-26 would be pending.

Applicants propose to amend claims 1, 10, and 18 to correct the language to which the Examiner objected. Accordingly, Applicants respectfully request the Examiner to withdraw the objection to claims 1, 10, and 18.

Applicants respectfully traverse the rejection of claims 1, 3, 4, 6-10, 12, 14-18, and 23-26 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel*, *Severin*, and *Yeluripati*.

Independent claim 1 recites a computer program product being operable to cause data processing apparatus to:

receive the metamodel in a first language, the metamodel describing a diagram of classes that define the development objects, the development objects representing building blocks for developing the application . . . [.]

generate a set of intermediate objects to represent the classes of the metamodel . . . [, and]

generate the API using the set of intermediate objects as inputs, wherein the API is for accessing the development objects to develop the application.

Combinations of *Kadel*, *Severin*, and *Yeluripati* fail to teach or suggest at least these features of claim 1.

Kadel relates to a mediation API that operates between data source components and data consumer components. *Kadel*, Abstract and Figure 1. But *Kadel*'s mediation API does not constitute the claimed "API" at least because *Kadel* does not teach or suggest a metamodel "describing a diagram of classes that define the development objects," "generat[ing] a set of intermediate objects to represent the classes of the metamodel," and "generate the API using the set of intermediate objects as inputs," as recited in claim 1 (emphasis added).

Severin fails to remedy the deficiencies of *Kadel*. *Severin* discloses a meta-implementation layer between a metamodel and its implementation. *Severin*, ¶ [0185]. But *Severin* does not teach or suggest a metamodel "describing a diagram of classes that define the development objects," "generat[ing] a set of intermediate objects to represent the classes of the metamodel," and "generate the API using the set of intermediate objects as inputs," as recited in claim 1 (emphasis added).

Yeluripati fails to remedy the deficiencies of *Kadel* and *Severin*. *Yeluripati* discloses a functional bean modeling a business method. *Yeluripati*, Abstract. The

functional bean is an object of an enterprise bean class. But *Yeluripati* does not teach or suggest a metamodel "describing a diagram of classes that define the development objects," "generat[ing] a set of intermediate objects to represent the classes of the metamodel," and "generate the API using the set of intermediate objects as inputs," as recited in claim 1 (emphasis added).

Accordingly, combinations of *Kadel*, *Severin*, and *Yeluripati* fail to teach or suggest claim 1. Independent claims 10 and 18, while of different scope than claim 1, distinguish over *Kadel*, *Severin*, and *Yeluripati* for reasons similar to claim 1. Claims 3, 4, 6-9, 12, 14-17, and 23-26 are patentable at least due to their dependence from one of the independent claims.

Applicants respectfully traverse the rejection of claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel*, *Severin*, *Yeluripati*, and *Hejlsberg*.

Each of claims 20-22 depend from one of the independent claims. As discussed, *Kadel*, *Severin*, and *Yeluripati* fail to teach or suggest the independent claims. *Hejlsberg* fails to remedy these deficiencies by also failing to teach or suggest a computer program product being operable to cause data processing apparatus to: "receive the metamodel in a first language, the metamodel describing a diagram of classes that define the development objects, the development objects representing building blocks for developing the application . . . generate a set of intermediate objects to represent the classes of the metamodel . . . [and] generate the API using the set of intermediate objects as inputs, wherein the API is for accessing the development objects to develop the application," as recited, for example, in claim 1, and similar

recitations of claims 10 and 18. For at least these reasons, combinations of over *Kadel*, *Severin*, *Yeluripati*, and *Hejlsberg* fail to teach or suggest claims 20-22.

Applicants respectfully request that the Examiner enter this Amendment under 37 C.F.R. § 1.116, placing the claims in condition for allowance.

In view of the foregoing, Applicants submit that the amended claims are neither anticipated nor rendered obvious in view of the applied references. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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